Society of Chemical Manufacturers and Affiliates

The Society of Chemical Manufacturers and Affiliates (SOCMA) is the only U.S.-based trade association dedicated solely to the specialty chemical industry. Collectively, SOCMA members are key drivers to a successful economy, contributing \$24 billion annually to the U.S. GDP. Members play an indispensable role in the global chemical supply chain by producing intermediates, specialty chemicals and ingredients used to develop a wide range of industrial, commercial and consumer products, essential to the well-being and lives of people everywhere.

Attendees:

Jennifer Abril, SOCMA, President and CEO

Robert F. Helminiak, SOCMA Managing Director of Government Relations

Steel Hutchinson, GFS Organic Chemicals, Owner and President, (SOCMA's Previous Chairman)

Beth Bosley, Boron Specialties, LLC Owner and President (She has testified on behalf of small businesses)

John Foley, KMCO, KMTEX LLC, President and CEO

David Grimme, Baker Hughes, Vice President, Supply Chain

David Doles, Lonza, Senior Vice President, Global Head of Business Unit – Materials Performance &

Protection (SOCMA Chairman)

Ex. 5 - Deliberative Process

Existing Chemicals:

SOCMA has commented on the TSCA Framework Rules for Risk Evaluation and Prioritization

- SOCMA has asked for more clarity including: more details on pre-prioritization, a commitment to designating chemicals "low priority," a commitment to the science standards in the statute, using judgment to evaluate conditions of use that are a real concern (excluding non-compliance), a commitment to using "robust study summaries" from the EU REACH program, and more clarity on what constitutes unreasonable risk.
- SOCMA has also commented on the inventory reset rule, which will designate chemicals as either active or inactive.
- SOCMA also provided early input on the new Fee's rule which EPA plans to propose this summer. SOCMA suggested using the Producer Price Index (PPI) rather than Consumer Price Index (CPI) to adjust what is meant by "small business."

Ex. 5 - Deliberative Process

New Chemicals:

• Lonza has one case under review. The company recently submitted some additional information on the manufacturing and use operations for this substance, as well as some physical-chemical property data, which EPA is evaluating.

Ex. 5 - Deliberative Process